

EXHIBIT A

On November 28, 2022, BlockFi filed voluntary cases under Chapter 11 of the U.S. Bankruptcy Code. Additional information about our filing can be found on our blog [here](#).



☰ Our Privacy Policy

OUR PRIVACY
POLICY

Our Privacy Policy

BlockFi Inc. Privacy Policy

Last updated May 17, 2022

This Privacy Policy of BlockFi Inc. (“BlockFi,” “us,” “we,” and “our”) describes the information we collect about you when you access our website or web and mobile applications, enter into agreements with us, use our services and products, send us communications, or otherwise engage with us, and what we do with such information. Any references to BlockFi in this Privacy Policy also refer to its wholly owned subsidiaries. This Privacy Policy covers all of our services and products and all methods by which you may access our website or our web and mobile applications.

By opening an account with us and utilizing our services, products, website, or web and mobile applications, you agree to the terms of our Privacy Policy. If you do not agree to the terms of our Privacy Policy, you cannot use our services or products and should not access our website or our web and mobile applications.

We understand that privacy is an important issue to you, and we respect the privacy of our consumers, clients, and users. We aim to protect the security and confidentiality of Personal Information about you that we acquire.

Please see our [Privacy Notice](#) for additional information about how we use and share information we obtain to provide financial services and products.

Personal Information We Collect:

For the purposes of this Privacy Policy, Personal Information is information that can reasonably identify, relate to, describe, be associated with, or reasonably be associated with a particular individual or household. Personal Information also includes information that may be classified as “Personal Data” or “Personally Identifiable Information” in some jurisdictions. This Privacy Policy does not apply to anonymized or de-identified data that cannot be used to identify you.

We may collect, store, use, and transfer the following types of Personal Information:

Identity Data such as name, mailing address, email address, telephone and mobile number, date of birth, geolocation, government issued identification information (e.g., driver's license, social security number, tax identification number, passport information), age, gender, nationality;

Transaction Data such as cryptocurrency wallet address(es), information relating to your BlockFi account and cryptocurrency trading transactions and related information for deposits or withdrawals, credit card information (e.g., last four digits of card number, expiration date, card status), credit card payment information (e.g., amount, date, frequency, status, balance), information relating to credit card transactions;

Financial Data such as bank name, bank account number, bank routing number, income type, annual income amount, monthly housing expenses, information that may be received from consumer reporting agencies (e.g., credit bureau reports);

Employment Data such as employment status, employment history, education history, resume information, recruitment information;

Device Data such as internet protocol (IP) address, device type and model, device keys, device location, web browser type and version, operating system (OS) type and version, device creation/modification/authentication dates, device IDs, device login history;

Online Data such as social media handle, browsing history, information regarding interactions with the website and mobile/web application (e.g., content viewed, links clicked, and features used);

Communications Data such as communication preferences and contents of your communication with us (e.g., chat and email);

Audio/Visual Data such as phone conversations, photographs; and

Survey and Research Data such as survey and questionnaire responses.

Other Information We Collect

We also collect other information in the form of aggregated statistics that does not uniquely identify you as an individual. This information is referred to as "de-identified data". We collect de-identified data when you interact with us and use our services and products. Examples may include traffic visits on the website and web application, information on the links you click, the features of our website that you use, and the types of information you upload. We may share de-identified data with our advertising and marketing service providers and partners to evaluate the effectiveness of our marketing programs. Additionally, we may use this information to analyze your usage of our website and for other research to help us improve the services and products we offer.

How We Collect Your Personal Information

We collect your Personal Information from the following sources:

Direct Interactions. You provide Personal Information when you use our services and products, open an account with us, apply for a credit card with us, request marketing information, enter a contest or sweepstakes, participate in a promotion, engage with our social channels and/or contact us with questions or requests.

Technological Interactions. When you use our services and products, use our applications, or visit our website, we may collect Device Data and Online Data through cookies and other similar technologies ([Use of Cookies and Other Similar Technologies](#)).

Third Parties. We collect Personal Information from third parties as required or permitted by applicable law. Third-party sources may include, but are not limited to, public databases, credit bureaus, identity verification partners, resellers and channel partners, joint marketing partners, advertising networks and analytics providers, social media platforms, and our BlockFi Rewards Visa Signature Card partner. We also receive Personal Information about you from third parties who you have authorized to disclose information about you that we may need for the user and borrower account (i.e., BlockFi account) opening process, to satisfy our Know Your Customer (KYC) and Anti-Money Laundering (AML) obligations, to effect account transactions and operations, and to provide services associated with the BlockFi Rewards Visa Signature Card. Additionally, we receive Personal Information when you link a third-party service to our services. Such linkage may include interactions with our social media sites. Third-party sites are governed by their own privacy policies, and you should review those privacy policies before using those sites.

How We Use Your Personal Information

We may collect and use your Personal Information, as required or permitted by applicable law, to:

- Provision our services and products in order to meet our contractual obligations to you;
- Conduct background checks for Know Your Customer (KYC) reviews and Anti-Money Laundering (AML) watchlists;
- Send you notices and confirmations regarding your fiat/cryptocurrency transfers to and from BlockFi;
- Send you confirmations and other information regarding your account transactions;
- Create your account statements, maintain records of your transactions, and provide support to your account generally;
- Deliver content about our services and products, and send promotional and other information to you; and
- Conduct analysis regarding your usage of our services and products and the effectiveness of our marketing initiatives.

We will not use your Personal Information for purposes other than those purposes we have disclosed to you without your permission. If we need to use your Personal Information for an

unrelated, new, or additional purpose, we will notify you and obtain your consent to use it for such unrelated, new, or additional purpose.

Legal Basis for Collecting and Using Your Personal Information

We rely on the following legal bases, as required by applicable law, to collect and use your Personal Information:

- Where collection and use of your Personal Information is necessary for the performance of a contract (e.g., using your information to deliver a purchased service or product);
- Where the collection and use of your Personal Information is required to comply with the law;
- Where the collection and use of your Personal Information is necessary for our legitimate interest provided it does not override your rights and freedoms; and
- Where you have given us your consent to collect and use your Personal Information.

Sharing Your Personal Information

We do not disclose your Personal Information to any third parties, except to those who require access to the data in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. This may include, but is not limited to, any obligations of BlockFi under the USA PATRIOT Act, and in order to facilitate the execution of our clients' cryptocurrency transactions in the ordinary course of business.

We may share, transfer, disclose, or allow access to the categories of Personal Information as outlined in "Personal Information We Collect" with the following categories of third parties:

Affiliates. We may share your Personal Information with our wholly owned subsidiaries that distribute or market BlockFi products and services in accordance with this Privacy Policy.

BlockFi Rewards Visa Signature Card Partners. We may share your Personal Information with our credit card partner and our credit card rewards partner to offer you services associated with the BlockFi Rewards Visa Signature Card, in accordance with the privacy policy applicable to the BlockFi Rewards Visa Signature Card.

Service Providers. We may share your Personal Information with financial, accounting, legal, marketing, and technology companies to provide services such as, but not limited to, data processing, administrative services, regulatory support, legal services, liquidity services, bank services, cloud storage, authentication support, payment processing, technical support, sales, client support, data hosting, marketing analytics auditors, accountants, cryptocurrency exchange and custodians, and cryptocurrency forensic analysis services.

Financial Institutions. We may share your Personal Information with certain financial institutions in connection with transfers of funds to protect legitimate transactions and to monitor and mitigate the likelihood of illicit transactions.

Regulatory and Government Authorities. We may share your Personal Information with governmental entities, including, but not limited to, law enforcement, regulatory agencies, self-regulatory agencies, and other appropriate agencies.

We may share, transfer, allow access, or disclose your Personal Information to our affiliate companies and third parties to:

- Administer or process a transaction, product, or service you have authorized or requested, or in the context of facilitating the execution of a transaction;
- Validate client identity as required by applicable laws and regulatory requirements;
- Facilitate the process for opening and maintaining client accounts (Personal Information is shared during the account opening process and shared on an ongoing basis thereafter);
- Carry out or aid in certain functions, including, but not limited to, account processing, surveillance, reconciliation, execution, document retention requirements, and document dissemination;
- Process payments that you have authorized;
- Operate, improve, and/or market our services and products;
- Transfer information to a purchaser of our business;
- Resolve a deficient balance upon account closing or excessive insufficient funds in your account;
- Deliver goods or services relating to promotions and special offers that require us to collect and share your Personal Information (e.g., mailing address);
- Provide services, including, but not limited to, consulting, sales, client support operations, payment processing, authentication services, and technical support; and
- For other purposes which may include, but are not limited to, third-party audits, which may require disclosure to third parties about your account or transactions with your prior written permission.

Other circumstances under which we may disclose your Personal Information include to:

- Enforce and/or investigate violations of our agreements, policies, procedures and/or terms of use;
- Help prevent potential fraud or other potentially unlawful activities and report suspected illegal activities;
- Prevent physical harm or financial loss;
- Comply, as necessary, with applicable laws and regulatory requirements;

- Respond to legal or governmental requests or demands for information (e.g., subpoena, court order, or other legal proceedings); and
- Meet national security requirements.

If an affiliate company or another third party needs access to certain Personal Information to carry out certain functions on our behalf, they do so under our instructions. Third parties with whom we share your Personal Information have their own privacy policies; however, they are expected to protect this information in a manner that aligns with the protocols described in this Privacy Policy and as applicable law may require. We do not share Personal Information with third parties for their own benefit, unless you have given us your consent.

Opting Out of Sharing Your Personal Information

In addition to the circumstances described above, from time to time, we may request your permission to allow us to share your Personal Information with third parties. You may opt out of having your Personal Information shared with third parties, under certain circumstances, or from allowing us to use your Personal Information for a purpose that is incompatible with the purposes for which we originally collected it, or subsequently obtained your authorization. If you choose to so limit the use of your Personal Information, certain features or BlockFi services may not be available to you.

Third-Party Websites

We may have links to unaffiliated third-party websites on our website. These third-party websites have their own privacy policies. We have no involvement with their policies and are not responsible for their practices. You are encouraged to review the privacy policies of all third-party websites you visit.

Marketing Communication

We, or our service providers on our behalf, may use your Personal Information to send you marketing and promotional communication that we believe may enhance or inform your experience with our services or products, or may be of interest to you. If you do not want to receive marketing and promotional communication from us, you can opt-out at any time by contacting us ([How to Get in Touch with BlockFi](#)), or by unsubscribing via the links provided in the marketing emails.

Sale of Your Personal Information

We do not sell your Personal Information.

Personal Information of Minors

Our services and products are not intended for individuals under the age of eighteen (18). We do not knowingly collect and use Personal Information related to minors.

Use of Cookies and Other Similar Technologies

Cookies are small text files sent from a site to a user's device to store bits of information related to that user or device. First-party cookies are put on your device directly by our website, which allows us to collect analytical data and provide other useful functions that create a good user experience. Third-party cookies are placed on your device by a third party (e.g., advertiser or analytic system). The third parties who serve cookies on our site may link your Personal Information to other information they collect.

We use cookies in order to provide better service, to facilitate use of our website, to track usage of our website and services, to collect data, and to address certain security issues. When you access our website or services, we may send the cookies to your computer or phone. Your computer or phone stores the cookies in a file located inside your web browser. The cookies help us keep track of your visits to our website and your activity with our website and services to understand how you interact with us.

We may link the information collected by cookies with other information we collect from you pursuant to this Privacy Policy and use the combined information as set forth herein.

We use the following types of cookies:

Strictly Necessary Cookies allow us to provide basic website functions such as browsing capabilities and secure access.

Functional Cookies allow us to provide enhanced functionality. For example, we use these cookies to notify you of account updates, notifications, and reminders. You may refuse to accept these cookies; however, this may affect access to certain parts of our website. Additionally, you may not be able to take advantage of personalized features.

Performance / Analytics Cookies collect information about how you use our website, for example, which pages you visited and which links you clicked. The information collected is aggregated and cannot be used to identify you.

Marketing Cookies may be set on our website by our advertising and marketing service providers and partners. They are used to track online activities and help us provide relevant advertising, links, or other information about our services and products to users visiting other websites after visiting our website.

In addition to cookies, we use pixels to measure our marketing campaigns and to understand how users navigate and process the content on our website and interact with our services.

We use growth, engagement, and analytic tools of third-party advertising networks such as Google and Facebook. You can learn more about their platforms by clicking [here](#) and [here](#). You can learn more about Google's opt out feature by clicking [here](#).

Managing Cookies and Other Similar Technologies

Cookies

You can clear categories of cookies by selecting [Reset Cookie Preferences](#). Additionally, you can activate or later deactivate the use of cookies through a functionality built into your web browser. If you want to learn more about cookies, or how to control, disable or delete them, please visit <https://www.allaboutcookies.org/> for detailed guidance.

You can opt out of certain web-based targeted advertising by visiting the Digital Advertising Alliance (DAA) for participating companies at <https://optout.aboutads.info/?c=2&lang=EN>, or the Network Advertising Initiative (NAI) for participating companies at <https://optout.networkadvertising.org/?c=1>. Individuals residing in Canada can visit <https://youradchoices.ca/en/tools> to learn about the DAA’s opt out choices. Individuals residing in Europe can learn about opt out choices for web-based targeting advertising by visiting <https://www.youronlinechoices.eu/>.

Mobile Advertising

You can opt out of having your mobile advertising identifiers used for certain types of advertising by accessing the relevant settings in your mobile device and following the instructions. You can download the DAA’s AppChoice’s mobile application to opt out of interest-based mobile application advertising for participating companies by visiting <https://youradchoices.com/appchoices>.

Name of Cookie/Identifier	What does the cookie generally do (e.g., website function and administration, analytics, marketing)?	Is it a 1st or 3rd party cookie and what is the name of the party providing it?	What type of cookie is it (persistent or session)?	What is the duration of the cookie on the website (if not cleared by the user)?
BlockFi	User Session	1st	Persistent	1 day
Segment	User Session	1st	Persistent	1 year
Google Ads	Analytics, Caching, Ads	3rd – Google	Persistent	2 years
Google Analytics	Analytics	3rd – Google	Persistent	2 years
Drift	Analytics, Chat	3rd – Drift	Persistent	Forever
HotJar	Analytics	3rd – HotJar	Persistent	Forever
Facebook	Analytics, Ads	3rd – Facebook	Persistent	90 days
LinkedIn	Analytics, Ads	3rd – LinkedIn	Persistent	90 days
Twitter	Analytics, Ads	3rd – Twitter	Persistent	90 days

Reddit	Analytics, Ads	3rd – Reddit	Persistent	90 days
Snapchat	Analytics, Ads	3rd – Snapchat	Persistent	1 year
Quora	Analytics, Ads	3rd – Quora	Persistent	1 year
Amplitude	Analytics	3rd – Amplitude	Persistent	Forever

Security

We strive to ensure that our systems are secure and that they meet industry standards. We seek to protect non-public Personal Information that is provided to BlockFi by third parties and you by implementing physical and electronic safeguards. Where we believe appropriate, we employ security measures such as, but not limited to, firewalls, intrusion prevention, encryption technology, user authentication systems (e.g., passwords and personal identification numbers, as well as multi-factor authentication) and access control mechanisms to control access to systems and data. We endeavor to engage service providers that have security and confidentiality policies, if such service providers have access to our clients' Personal Information. We train and instruct our employees to use strict standards of care in handling the personal financial information of clients. As a general policy, our staff will not discuss or disclose information regarding an account except with authorized personnel of our service providers, as required by applicable laws and regulatory requirements, or pursuant to a regulatory request and/or authority.

Despite our efforts to protect the security of your information, no security system is always effective and we cannot guarantee that our systems will be completely secure. However, we do have processes and procedures in place to remediate security risks and address any suspected or actual data breach, and will notify you and regulators of a data breach where required by applicable law.

Retention

We are required under applicable laws and regulatory requirements to retain certain information, including, but not limited to, Personal Information of clients, client profiles, identification verification materials, information we use to satisfy our Know Your Customer (KYC) and Anti-Money Laundering (AML) obligations, account information, account agreements, trade orders, trade confirmations and other agreements, account statements, and other records.

Such records are generally retained as required by law, rule or regulation, or for the minimum amount of time necessary to accomplish the purpose for which it was collected, and thereafter no longer than is permitted under BlockFi's data retention policies.

Should you decide to close your account, we will mark your account "Closed", but will retain copies of information about you and any transactions or services in which you may have

participated in accordance with applicable law and for a period of time that is consistent with such law, applicable statute of limitations, or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our services and products, to assist with investigations, to enforce any of our terms and conditions or other applicable agreements or policies, or to take any other actions consistent with applicable law or in accordance with this Privacy Policy. Your Personal Information will not be used by us for any further purposes, nor shared with third parties, except as stated in this section.

Storing, Transferring, or Processing Your Personal Information Internationally

We may share your Personal Information with affiliate companies, service providers, and other third parties who may access or store this information in various countries, including countries without a level of data protection deemed ‘adequate’ by the European Commission, such as, but not limited to, Argentina, Bermuda, Cayman Islands, Philippines, Poland, United Kingdom, and Singapore. You consent to the transfer of your information, including Personal Information, to these countries as set forth in this Privacy Policy by visiting our site or using our services and products.

If you reside in the European Economic Area (“EEA”), the UK or Switzerland, we enter into the appropriate data processing agreements with affiliate companies, service providers, and other third parties in other countries including, when required, standard contractual clauses approved by the European Commission.

Your Privacy Rights

Depending on the jurisdiction where you reside, you have certain rights over your Personal Information. These rights may include, but are not limited to, the rights described in “General Data Protection Regulation (Applicable to European Union (EU) Residents)” and “California Privacy Rights (Applicable to California Residents)” below.

You may exercise these rights, based on the applicable jurisdiction, by contacting us ([How to Get in Touch with BlockFi](#)). Note that we may refuse to grant your requests in whole or in part, as permitted by applicable law.

General Data Protection Regulation (Applicable to European Union (EU) Residents)

The General Data Protection Regulation (GDPR) allows individuals residing in the EU certain rights over their Personal Information. To exercise these rights, please contact us ([How to Get in Touch with BlockFi](#)). These rights include:

Right to Access. You may request we provide you a copy of the Personal Information we hold about you and certain information about our processing of this information.

Right to Rectify. You may request we update or correct inaccuracies in your Personal Information or complete it if necessary.

Right to Erasure. You may request we delete your Personal Information from our records subject to certain exceptions. For example, we may deny your request if retaining your Personal

Information is required under certain circumstances, including, but not limited to: complying with a legal obligation; establishing, exercising or defending legal claims; or performing a task in the public interest or in the exercise of official authority.

Right to Data Portability. You may request we transfer a machine-readable copy of your Personal Information to you or a third party of your choice. We will provide you, or the third party, your Personal Information in a machine-readable format. This right only applies to Personal Information you have consented for us to use.

Right to Restrict Processing. You may request we restrict or suppress the processing of your Personal Information under certain circumstances: to establish the accuracy of the Personal Information; where the processing is unlawful, but you do not want your Personal Information erased; where we no longer need to process your Personal Information, but the information must be retained for legal reasons; and where you have objected to our processing your Personal Information, but we need to determine whether our legitimate interest overrides your objection.

Right to Object. You may object to our reliance on our legitimate interests as the basis of our processing of your Personal Information that impacts your rights. You also may object to our processing of your Personal Information for direct marketing purposes.

Right to Withdraw Consent (“Opt-out”). You may withdraw your consent at any time where we are relying on it to process your Personal Information. Withdrawing your consent does not affect the lawfulness of our processing of your Personal Information prior to withdrawing.

Information We May Need from You

We may need to request specific information from you (e.g., name and email address) to help us confirm your identity and verify your request. This is a security measure to ensure that your Personal Information is not disclosed to any person who has no right to receive it, and that your Personal Information is not deleted at the request of anyone but you. We may also contact you to ask you for further information in relation to your request.

Time to Respond to Your Requests

We try to respond to all legitimate and verifiable requests within thirty (30) days. Occasionally, it may take us longer than thirty (30) days if your request is particularly complex, you have made several requests, or additional information is needed from you to process your request. In this case, we will notify you within the initial thirty (30)-day period and keep you updated.

If you have an account with us, we may deliver our response to that account. If you do not have an account with us, we will deliver our response by mail or electronically. If we cannot comply with your request, we will provide a detailed explanation of why we cannot comply.

Fees

You will usually not have to pay a fee to exercise any rights listed above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may refuse to comply with your request under these circumstances.

In addition to the rights listed above, you also have the right to lodge a complaint with your local Supervisory Authority if you believe that our processing of your Personal Information does not comply with the GDPR. You can find your data protection regulator [here](#).

We would appreciate the chance to deal with your concerns, so please contact us ([How to Get in Touch with BlockFi](#)) if you have any issues or complaints with our processing of your Personal Information.

California Privacy Rights (Applicable to California Residents)

California Consumer Privacy Act (CCPA)

The CCPA went into effect on January 1, 2020. It affords California residents specific rights over their Personal Information. To exercise these rights, please contact us ([How to Get in Touch with BlockFi](#)). These rights include:

Right to Notice. You have the right to receive notice, before or at the point of collection, about the categories of Personal Information we collect and its intended purpose. We may not collect additional Personal Information categories or use collected Personal Information for unrelated, new, or additional purposes without providing notice to you.

Right to Know and Access. You have the right to know and access the categories of Personal Information collected, the specific types of Personal Information collected, the categories of sources from which Personal Information is collected, the business or commercial purpose for collecting and/or disclosing the Personal Information, the categories of Personal Information sold or disclosed, the categories of third parties to whom the Personal Information was sold or disclosed, and the business or commercial purpose for collecting or selling Personal Information. Additionally, you have the right to receive this information in a portable, usable, and machine-readable format.

Right to Deletion. You have the right to request deletion of your Personal Information subject to certain exceptions. For example, we may deny your request if retaining your Personal Information is required under certain circumstances such as: to complete the transaction for which we collected the Personal Information, provide goods or services that you requested; take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activities, or prosecute those responsible for such activities; or comply with a legal obligation.

Non-Discrimination. You have the right to not face discrimination for asserting your rights subject to certain parameters. Under the CCPA, we may not take retaliatory or discriminatory actions against any consumer who chooses to exercise any of these rights. Thus, we cannot deny you our services and products. The law prohibits any practices that are usurious, coercive, or unjust.

Opt-Out of the Sale of Personal Information. You have the right to opt-out of the sale of your Personal Information. However, since we do not sell your Personal Information, there is no need for you to exercise this right.

We may need to request specific information from you (e.g. name and email address) to help us confirm your identity and verify your request. This is a security measure to ensure that your Personal Information is not disclosed to any person who has no right to receive it, and that your Personal Information is not deleted at the request of anyone but you, unless the individual is your authorized agent. We may also contact you to ask you for further information in relation to your request.

Time to Respond to Your Requests

We try to respond to all legitimate and verifiable requests within forty-five (45) days. Occasionally it may take us longer than forty-five (45) days if your request is particularly complex, you have made several requests, or additional information is needed from you to process your request. In this case, we will notify you within the initial forty-five (45)-day period and keep you updated.

If you have an account with us, we may deliver our response to that account. If you do not have an account with us, we will deliver our response by mail or electronically. If we cannot comply with your request, we will provide a detailed explanation of why we cannot comply.

Please note, we are not required to action requests to access your Personal Information more than twice in a 12-month period.

Fees

You will usually not have to pay a fee to exercise any rights listed above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may refuse to comply with your request under these circumstances.

Authorized Agents

You can authorize a designated agent to exercise your rights on your behalf. To authorize a designated agent please contact us ([How to Get in Touch with BlockFi](#)).

California Shine the Light (California Civil Code 1798.83)

California residents, who have an established business relationship with us, may request that we disclose the categories of Personal Information we share with third parties, if any, for the third parties' direct marketing purposes, and the list of third parties to whom the Personal Information was shared in the preceding calendar year. To request this disclosure, please contact us ([How to Get in Touch with BlockFi](#)). Please note, the request is free of charge and we are required to respond to one request per California resident each year.

California Financial Information Privacy Act

The California Financial Information Privacy Act limits what we can do with your financial information and gives you rights to limit our sharing of your financial information. Under the California Financial Information Privacy Act, California residents have the right to: receive notice

and opt-in to us sharing non-public Personal Information with non-affiliated third parties; receive notice and opt-out of sharing non-public Personal Information with affiliates; and opt-out of Personal Information sharing resulting from joint-marketing agreements with non-affiliated third parties to market financial products and services.

We do not share your information with affiliates and non-affiliated third parties, except for certain business purposes (e.g., to service your accounts), to market our products and services, as permitted by law, or with your consent. You can access our [Privacy Notice](#) for information about our practices in accordance with the California Financial Privacy Act. Please contact us ([How to Get in Touch with BlockFi](#)) to opt-in to, or opt-out of, sharing your non-public Personal Information.

California “Do Not Track” Policy

California law requires us to inform you how we respond to web browser Do Not Track (“DNT”) signals. Because no industry or legal standard exists for recognizing or honoring DNT signals, we do not respond to them at this time. This Privacy Policy is subject to change as the privacy community and industry develop best practices for responding to DNT signals.

Vermont Privacy Rights (Applicable to Vermont Residents)

Vermont Financial Privacy Act

The Vermont Financial Privacy Act limits what we can do with your financial information and gives you rights to limit our sharing of your financial information. Under the Vermont Financial Privacy Act, Vermont residents have the right to receive notice and opt-in to sharing non-public Personal Information with non-affiliated third parties. Additionally, residents must consent to us sharing information regarding credit worthiness.

We do not share your information with affiliates and non-affiliated third parties, except for certain business purposes (e.g., to service your accounts), to market our products and services, as permitted by law, or with your consent. Additionally, we will not disclose credit information about you with our affiliates or non-affiliated third parties, except as required or permitted by law. You can access our [Privacy Notice](#) for information about our practices in accordance with the Vermont Financial Privacy Act. Please contact us ([How to Get in Touch with BlockFi](#)) to opt-in to, or opt-out of, sharing your non-public Personal Information.

Changes to BlockFi’s Privacy Policy

This Privacy Policy is available on our website at www.blockfi.com. BlockFi reserves the right to make changes to this Privacy Policy. You should review our Privacy Policy frequently. If we make material changes to our Privacy Policy, our revised Privacy Policy will be posted on our website and it will either be noted on our website that material changes have been made or we will notify our clients by email. The date of the most recent update to our Privacy Policy will be set forth in this Privacy Policy.

How to Get in Touch with BlockFi

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should first contact us either by emailing us at privacy@blockfi.com or by writing to us at BlockFi Inc., 201 Montgomery Street, Suite 263, Jersey City, New Jersey 07302, or by calling us at 1-646-779-9688.

If you would like to submit a complaint about our use of your Personal Information or response to your requests regarding your Personal Information, you may contact us at privacy@blockfi.com.

Last Updated: May 17, 2022

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BlockFi Lending LLC NMLS ID#1737520 | NMLS Consumer Access
BlockFi Trading LLC NMLS ID#1873137 | NMLS Consumer Access

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Digital currency is not legal tender, is not backed by the government, and crypto accounts held with BlockFi are not subject to FDIC or SIPC protections. Digital currency values are not static and fluctuate due to market changes. Not all products and services are available in all geographic areas and are subject to applicable terms and conditions. Eligibility for particular products and services is subject to final determination by BlockFi. Rates for BlockFi products are subject to change.

BlockFi Rewards Credit Card: For more information, please see BlockFi's Terms of Service. BlockFi is not a Bank. Cards are issued by Evolve Bank & Trust, Member FDIC, pursuant to a license from Visa® USA Inc. Rewards are not offered by Evolve Bank & Trust and are instead offered and managed by BlockFi.

BlockFi International Ltd. holds a Class F digital assets business license under the Digital Assets Business Act, 2018 (as amended) and is licensed by the Bermuda Monetary Authority to conduct the following digital assets business activities: (i) issuing, selling or redeeming virtual coins, tokens or any other form of digital assets (ii) operating as a digital asset exchange (iii) providing custodial wallet services (iv) operating as a digital asset derivative exchange provider and (v) operating as a digital assets services vendor.

See blockfi.com/terms for more information.

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